

DANIEL G. BOGDEN  
United States Attorney  
MEGAN RACHOW  
State Bar of Nevada No. 8231  
Assistant United States Attorney  
100 W. Liberty Street, Suite 600  
Reno, Nevada 89501  
Tel: (775) 784-5438  
Attorneys for Plaintiff

**FILED**

**MAR 18 2010**

**U.S. MAGISTRATE JUDGE  
DISTRICT OF NEVADA**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**3:10-MJ-0023-RAM**

UNITED STATES OF AMERICA,	)	
	)	COMPLAINT FOR VIOLATION OF:
Plaintiff,	)	
v.	)	TITLE 18, UNITED STATES CODE,
	)	SECTION 2113(a) - Bank Robbery
MATHEW DEAN LANE,	)	
	)	
Defendant.	)	

Before the Honorable Robert A. McQuaid, Jr., United States Magistrate Judge, Reno, Nevada,  
the undersigned complainant being first duly sworn states:

On or about March 17, 2010, in the District of Nevada, MATHEW DEAN LANE, defendant  
herein, by force and violence and by intimidation, did take from the person and presence of a bank teller  
at the Wells Fargo Bank, 200 South Virginia Street, Reno, Nevada, money belonging to and in the care,  
custody, control, management and possession of the said Wells Fargo Bank, the deposits of which were  
then insured by the Federal Deposit Insurance Corporation; all in violation of Title 18, United States  
Code, Section 2113(a).

Complainant, as a Special Agent with the Federal Bureau of Investigation, Reno, Nevada, states  
that there is probable cause as set forth in the attached Affidavit.

AFFIDAVIT

I, Mark A. Jenkins, being duly sworn, depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for approximately twelve years. I am currently assigned to the Reno Resident Agency and work on the Violent Crimes/Major Offenders Squad, which has the responsibility for investigating bank robberies.

2. The following is based on information and belief, the source of that information and basis for that belief being information obtained from investigation conducted personally and from that conducted by other law enforcement agents.

3. On Wednesday, March 17, 2010, I was advised the Wells Fargo Bank located at 200 S. Virginia, Reno, Nevada, within the District of Nevada and insured by the Federal Deposit Insurance Corporation (FDIC), was robbed of \$945.00 at approximately 4:50 p.m. on that date.

4. Several video surveillance cameras inside the bank recorded the bank robbery and surveillance photographs were obtained.

5. Employees at the bank stated the robber initially entered the bank, waited in line and then approached the teller counter. At the teller counter, the robber handed the victim

teller a demand note which stated; "EMPTY REGISTER, I HAVE A GUN, THANK U." The victim teller complied with the demand note and took most of the money from her drawer and handed it to the robber. The teller appeared upset and shaken. The teller did include an ETS (Electronic Tracking System) pack and the bait bills in the stack of bills she handed the robber. The robber then fled the bank.

6. The robber was described as a white male, 6'03" tall, 240 pounds, mid 20s, with a large build. The robber was further described as wearing a white hooded sweatshirt, blue jeans and a black baseball cap. This description is consistent with the robber depicted in the bank surveillance photos.

7. Witnesses at the bank observed the bank robber get into a white Reno/Sparks taxi cab #538 after exiting the bank, and leave the scene.

8. A short distance from the bank, a Reno Police Officer spotted the taxi cab and made a felony traffic stop of the taxi cab.

9. A white male matching the description of the individual that just robbed the Wells Fargo bank was detained at the scene until additional police officers and detectives arrived. This individual was identified as: Mathew Dean Lane, date of birth September 12, 1985. Lane was subsequently transported to the

Reno Police Department for questioning.

10. The taxi driver was interviewed at the scene and stated that he picked up LANE at 4:49 p.m. at the corner of 3rd street and S. Virginia. Initially the taxi driver said Lane told him to go to the nearest bank. The taxi driver said he first took him to the Bank of America located at 7th Street and Virginia. The taxi driver said Lane went into the Bank of America and then came back out and stated he couldn't be helped. Lane then told the taxi driver to take him to the Wells Fargo which is located at 200 S. Virginia. The taxi driver said Lane went into the Wells Fargo bank and then came out a short time later, got into the taxi cab and said, "just drive, hurry, I'm in a rush. The taxi driver said he then drove away from the bank heading north bound on S. Virginia Street. After a short time, the taxi driver stated the police pulled in front of his taxi and told him and his passenger to get out of the vehicle.

11. After Lane was detained by Reno Police, the ETS pack from the Wells Fargo Bank was recovered on the ground next to the taxi cab.

12. Approximately \$1255.00 was recovered from Lane at the time of his arrest by Reno Police Officers, a check of the bait bill list provided by Wells Fargo Bank determined Lane had 17 out of the 18 bait bills on his person. The 18th bait bill was

recovered from the taxi driver. Lane also had the demand note used in the robbery of the Wells Fargo Bank in his pocket.

13. Lane was interviewed at the Reno Police Department and after being advised of his constitutional rights stated that he did in fact rob the Wells Fargo Bank located on S. Virginia Street. Lane said he took a taxi to the bank, passed a note to the teller, got the money and left in the taxi cab.

14. At the time of Lane's interview, he was wearing a white hooded sweatshirt, blue jeans and also had a black baseball cap.

15. Based on the foregoing, I submit there is probable cause to believe that on March 17, 2010, Lane, did unlawfully and by force, violence and intimidation, take from the person and presence of a bank employee, \$945.00, belonging to and in the care, custody, control, management and possession of the Wells Fargo Bank, located at 200 S. Virginia Street, Reno, Nevada, located in the District of Nevada, which was then insured by the

///

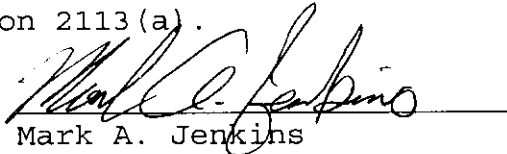
///

///

///


///

Federal Deposit Insurance Corporation, all in violation of Title  
18, United States Code, Section 2113(a).

A handwritten signature in black ink, appearing to read 'Mark A. Jenkins', is written over a horizontal line.

Mark A. Jenkins  
Special Agent  
Federal Bureau of Investigation  
Reno, Nevada.

Subscribed and sworn to before me this 18th day of March, 2010.

A handwritten signature in black ink, appearing to read 'Robert A. McQuaid, Jr.', is written over a horizontal line.

ROBERT A. MCQUAID, JR.  
United States Magistrate Judge